Methods:

1. For each facility, extracted nutrient data of any type (ammonia, NO2+3, TN, SRP, TP, etc.) that was collected end-of-pipe. Average and max both considered.
2. Kept mainly summertime data, but used some off-season data if that is all that was available or dataset was small
3. Identified draft nutrient criteria of waterbody, or BPJ of what criteria are likely to be, at point of discharge
3. Compared magnitude of end-of-pipe data to TN or TP criterion
4. Dillution potential was then considered, giving consideration to the low-flow (or best estimated) ambient water quality for nutrients.
5. A conclusion was reached as to whether company would likely be able to comply (or not) without major upgrade

Facility Name	Receiving waterbody (from Statement of Basis)	PermitID	Nutrient data available for review in effluent	Major Assumptions Made	Conclusion relative to meeting base numeric nutrient standards
Sidney Sugars Incorporated	Yellowstone River (B-3)	MT0000248	N, P	None	Can comply with little or no upgrade
Conoco Phillips-Billings Refinery	Yegan Drain (C-3)	MT0000256	N	None	**Will need upgrade**
Cenex Harvest States Coop.	Yellowstone River (B-2)	MT0000264	N	Used BPJ to estimate this large river's future criteria based on the findings of the lower Yellowstone River QUAL2K model	**Will need upgrade**
Western Sugar Cooperative	Yegan Drain (C-3)	MT0000281	N,P	None	**Will need major upgrade**
Exxon Mobile Refining & Supply	Yellowstone River @ Billings (B-3)	MT0000477	N	Used BPJ to estimate this large river's future criteria based on the findings of the lower Yellowstone River QUAL2K model	**Will need major upgrade**
Holcim Trident (cement Manufacture)	Missouri River (B-1)	MT0000485	N, P	BPJ used to estimate this large river's future criteria; assumed lots of dillution is available after review of ambient river nutrient data	Can comply with little or no upgrade
Stillwater Mining-Stillwater (metals)	Groundwater (class I)	MT0024716	N,P	Assumed direct connection between surface water ponds, groundwater, and surface water for N.	**Will need upgrade but they are close to meeting N now; P release not an issue from ponds**
REC Advanced Silicon	Sheep Gulch (B-1, perennialized)	MT0030350	N, P	None	**Will need upgrade**
Fidelity (CBM development)	Tongue River (B-2 or B-3)	MT0030724	N, P	Assumed lots of dillution after review of ambient river nutrient data	Can comply with little or no upgrade
Western Energy Co.-Rosebud Mine		MT0023965	no nutrient data		Cannot conclude
Corette Thermal Plant		MT0000396	no nutrient data		Cannot conclude